

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition	
Of	Case No. 24-cv-000941-JKB
GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,	<u>IN ADMIRALTY</u>
And	
SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,	
for Exoneration from or Limitation of Liability	

THE STATE OF MARYLAND’S MOTION FOR A LETTER OF REQUEST

The State of Maryland, by and through Anthony G. Brown, Attorney General of Maryland, on its own behalf and on behalf of all its agencies (the “State”); the Maryland Transportation Authority (“MDTA”), the Maryland Port Administration (“MPA”), and the Maryland Department of the Environment (“MDE”) (collectively, “Claimants”), respectfully request this Court issue the attached Letter of Request¹ to allow the State to obtain relevant discovery from HD Hyundai Heavy Industries Co., Ltd. (“HHI”).

HHI is a maritime company based at 1000, Bangeojinsunhwan-doro, Dong-gu, Ulsan, 44032, South Korea. It specializes in shipbuilding, engineering, and maritime machinery. The M/V

¹ The State notes that the attached Letter of Request is in English which is acceptable to the Republic of Korea. Republic of Korea - Central Authority & Practical Information, HCCH, <https://www.hcch.net/en/states/authorities/details3/?aid=846#:~:text=The%20Republic%20of%20Korea%20will,Request%20with%20a%20Korean%20translation.> (last visited Jan 15, 2025).

DALI was built at HHI's shipyard in the Republic of Korea and to this day, HHI and its authorized service representatives provide support to the M/V DALI, its managers, and its owners. Additionally, a large amount of engineering data onboard the M/V DALI can only be accessed by HHI or its authorized representative using proprietary software. Because of this, the State's ability to obtain evidence from HHI is crucial to the adjudication of the above captioned matter.

The Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, as adopted and implemented at 28 U.S.C. § 1781, authorizes this Court to request assistance from Korean judicial authorities in obtaining evidence from HHI.

Therefore, the State respectfully requests that the Court sign and issue the Letter of Request attached as Exhibit A in order to facilitate the collection of evidence from HHI.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I CERTIFY that on this 15th day of January 2025, the foregoing was filed in the United States District Court for the District of Maryland via the Court's CM/ECF filing system, which will provide notice of this filing to all counsel of record.

/s/ Margaret Fonshell Ward
Margaret Fonshell Ward